



**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 F Street, N.E.
WASHINGTON, D.C. 20549**

**DIVISION
OF ENFORCEMENT**

March 9, 2015

The Honorable Shira A. Scheindlin
United States District Judge
Southern District of New York
500 Pearl Street, Room 1620
New York, New York 10007-1312

Re: *SEC v. Wyly, et al.* 1:10-cv-5760

Dear Judge Scheindlin:

The Securities and Exchange Commission ("SEC") writes concerning the Stipulation and Protective Order Regarding Confidentiality of Discovery Materials in this case (Dkt. No. 56) (the "SDNY Protective Order"). The SEC wishes to be able to use materials covered by the SDNY Protective Order in the related Texas bankruptcy cases involving defendant Sam Wyly and relief defendant Caroline D. Wyly.

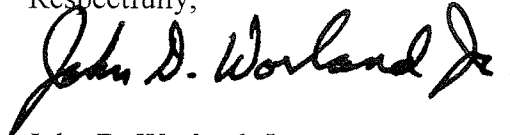
At the time the SDNY Protective Order was entered, there were no Bankruptcy Court related cases. Now there are two such cases, *In re Samuel Evans Wyly*, Case No. 14-35043 (Bankr. N.D.Tx.) and *In re Caroline D. Wyly*, Case No. 14-35074 (Bankr. N.D. Tx.), collectively the "Bankruptcy Proceedings." The Bankruptcy Proceedings are now being Jointly Administered pursuant to Bankruptcy Court Order as *In re Samuel Evans Wyly, et al. Debtors*, Case No. 14-35043 (Bankr. N.D.Tx.). See Dkt No. 134, Case No. 14-35043, November 10, 2014.

In addition, the SEC may need to use materials covered by the SDNY Protective Order in the Probate Court dealing with the estate of defendant Charles J. Wyly, Jr. That case is pending in Probate Court Number One of Dallas County, Texas, Cause Number PR-11-2903-1 (the "Probate Proceedings").

The SEC wishes to be able to use materials covered by the SDNY Protective Order in the Bankruptcy Proceedings, and possibly in the Probate Proceedings. With respect to "Confidential Information," as defined in the SDNY Protective Order, the SEC agrees that it will apply the same terms of use in the Bankruptcy Proceedings and the Probate Proceedings as it has applied in the SDNY action, including filing of information under seal whenever appropriate. The SEC agrees to apply all other terms of the SDNY Protective Order to any materials used in the Bankruptcy or Probate Proceedings.

Accordingly, the SEC respectfully requests that the Court confirm that the SEC and other parties to the SDNY may use Confidential Information, as defined in the SDNY Protective Order, in the Bankruptcy and Probate Proceedings, so long as they adhere to the restrictive terms of the SDNY Protective Order with respect to the use of such Information.

Respectfully,

A handwritten signature in black ink, reading "John D. Worland Jr." with a stylized, cursive script.

John D. Worland, Jr.
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cc: Counsel of record via email